

## REMARKS

With regard to the drawing objections in paragraph 1, a revised Figure 8 is submitted identifying the ball as 46'. It is noted that item 70 appears in Figure 5. The specification is corrected to change a reference to 70' where it originally incorrectly stated 70. The objections are considered overcome and a formal Figure 8 will be submitted upon notification by the Examiner that the proposed changes are acceptable.

The Abstract of the Disclosure has been amended to correct the noted informality in paragraphs 2 and 3 of the Office Action.

The various claim objections in paragraph 4 have been addressed although the applicant notes that no antecedent problem was found in claim 18 which currently recites "a second port" and not "the second port" and for that reason requires no antecedent for the second port. Claim 9 has been corrected to indicate that two separate positions may be selectively chosen.

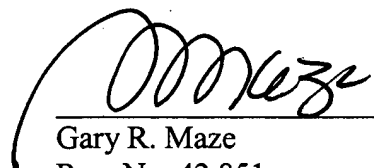
The sole independent claim is rejected over Zunkel USP 4,633,944. The Examiner points to Column 6 Lines 60-68 for the location of the feature that the excess gravel is removed without moving the crossover and the wash pipe. The Examiner has not referred to the paragraph immediately above that begins on line 48 and clearly states that the tubing string is pulled up after the gravel is placed to close the crossover assembly to allow a squeezing operation into the formation and against the screen. This operation can involve alternating between circulating and squeezing several times. Thereafter the excess gravel can be reverse circulated out. However, without initially lifting the string neither of these operations can be done.

Claim 1 recites that the excess gravel is removed without moving the crossover and the wash pipe. The definition of excess gravel can only be meaningful after the gravel is placed because until then there is no way to identify what gravel is "excess". Thus, in claim 1 the gravel is placed followed by removal of the excess without movement of the crossover and the wash pipe. In the reference, the gravel is placed and the excess can't be removed without string manipulation that reconfigures the porting on the crossover. This reference represents the problem that the present invention solves by elimination of the manipulation requirement after gravel deposition to get the excess out.

It is submitted that claim 1 and for that reason all the claims are in allowable condition as filed.

Respectfully submitted,

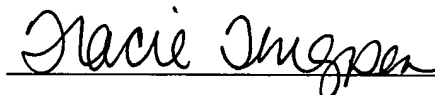
July 13, 2005



Gary R. Maze  
Reg. No. 42,851  
Duane Morris LLP  
3200 Southwest Freeway  
Suite 3150  
Houston, TX 77027  
Tel.: 713.402.3900  
Fax: 713.402.3901

**CERTIFICATE OF MAILING 37 CFR 1.8(a)**

I hereby certify that a copy of this document along with any referred to as attached or enclosed is being deposited with the United States Postal Service as First Class mail, postage prepaid in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on July 13, 2005.



HOU42545.1